

IN The United States District Court  
For The District of South Carolina

Rachel Buie Plaintiff  
2436 Willwood Dr. Apt J  
Florence S.C.  
29501

RCVD - USDC COLA SC  
JUN 30 '25 PM3:59

Civil # \_\_\_\_\_

v.

Florence Housing Authority  
1117 June LN# A Defendants  
Florence S.C. 29506

Ronald T. Scott  
Alexandra C. Williams  
1201 Main Street 22nd Floor  
Columbia S.C. 29201

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Rachel Buie

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Florence Housing Authority  
Ronald T Scott (Haynsworth  
Alexandra C Williams (Sinkler Boyd

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## Complaint for a Civil Case

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Jury Trial:  Yes  No  
(check one)

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Rachel Buie
Street Address	2436 Willwood Dr. A, J
City and County	Florence, Florence County
State and Zip Code	South Carolina 29501
Telephone Number	843-289-2042

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	Florence Housing Authority
Job or Title (if known)	
Street Address	1117 June Lane #A
City and County	Florence, Florence
State and Zip Code	South Carolina 29501
Telephone Number	

## Defendant No. 2

Name	Haynsworth Sinkler Boyd
Job or Title (if known)	Ronald T. Scott / Alexandria Williams Attorneys for Housing Authority
Street Address	1201 Main St. 22nd Floor
City and County	Columbia
State and Zip Code	S.C. 29211
Telephone Number	803-779-3080

## Defendant No. 3

Name	
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Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
  
Defendant No. 4  
  
Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

(HQS) 24 CFR 982.401 (24 CFR Part 5 and Part 902)  
(ADA)-42 U.S.C. 512101 et seq., Section 504,  
Fair Housing Act 3 36017, ADA 312203

Attachment to A

Section 504 of the Rehabilitation Act - 29 U.S.C  
(FHA and ADA)

Constitutional + Civil Rights Protections

Under the Fair Housing Act, ADA, and Section 504 of  
the Rehabilitation Act (Reasonable Accommodations)

Fair Housing Act § 3617  
Hud tenant protection

Duty to maintain safe and habitable housing, under 24 CFR  
§ 5.703

American with Disabilities Act (ADA) - 42 U.S.C §  
Title II of the ADA

Federal Rights as a Disabled Tenant

- (1) FHA, ADA, Section 504
- (2) FHA, Section 504
- (3) FHA § 3617, ADA, 12203
- (4) HUD Regulations + ADA
- (5) Section 504, ADA

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Rachel Brie, is a citizen of the State of (name) SOUTH CAROLINA.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

**b. If the defendant is a corporation**

The defendant, (name) Florence Housing Authority, is incorporated under the laws of the State of (name) SOUTH CAROLINA, and has its principal place of business in the State of (name) SOUTH CAROLINA. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

### 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

10,000,000.<sup>00</sup> The of all of the pain, suffering, mental abuse and unsafe and unhealthy environment we have endure from 2019- until May 29th 2025

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I have all my supporting documents with a brief description written, I filed this claim because my life will forever be changed. I reported this plumbing issues and how the reys continue numerous of time. I even ask could I transfer and I was told no. They didn't attempt to rescue us until 2 years later, then moved us in a house with the floors falling, to ultimately force me to court with a lie, that ultimately have me homeless now. I was force to live through help. I have 17 attach pages that I written

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

*An Motion*

I feel that I am entitle to Punitive damage because I substained injuries in this apartment that I reported to them, and during magistrate court the judge ask them was they aware of my injuries and they said yes. I had back surgery Nov. 15, 2024 from fallen down the stairs. The plumbing was so terrible we couldn't take a bath or shower for about 3 weeks. Poop feces was trapped in my kitchen sink and tub for weeks. Even up to this present time of being forced to court saying I owe them one thing and then getting in court saying I owed them something different. I'm asking the courts for 10,000,000.00 for my damages.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 6/30, 2025

Signature of Plaintiff

Printed Name of Plaintiff

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20 \_\_\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address

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